

From: [Hodges, Joe A](#)
To: [Schaub, Mike](#)
Subject: Re: [EXTERNAL] RE: Technical assistance: Louisiana statewide freshwater ammonia criteria
Date: Tuesday, July 21, 2020 3:10:54 PM

Sure thing. I don't have any other comments at the moment. I'll let you know if anything comes up and will keep all this info on hand for when this comes back around in the fall. Thanks for the update as well. Enjoy your vacation!

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Fish and Wildlife Biologist
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337.291.3109 (office)

From: Schaub, Mike <Schaub.Mike@epa.gov>
Sent: Tuesday, July 21, 2020 1:51 PM
To: Hodges, Joe A <joe_hodges@fws.gov>
Subject: RE: [EXTERNAL] RE: Technical assistance: Louisiana statewide freshwater ammonia criteria

Ah, I'm getting what you were after now. Sorry about that, wasn't thinking about the "proposed action" section of the BE. I'll be sure to include more detail in that section re: our use of normalized criteria and threshold values, and mention any changes to our normalized values if such changes occur. I appreciate the clarification.

Just as an aside, I spoke with Jamie Phillippe at LDEQ and he indicated that there are a few parts of their WQS submission that they will need to go out for public notice on again. This won't include anything with respect to the ammonia criteria. But, it probably will be late October before they actually submit anything for our action. So keep this in your back pocket for this fall! And feel free to let me know if you have any additional questions/suggestions on the BE.

Mike Schaub
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214-665-7314

From: Hodges, Joe A <joe_hodges@fws.gov>
Sent: Monday, July 20, 2020 1:30 PM
To: Schaub, Mike <Schaub.Mike@epa.gov>
Subject: Re: [EXTERNAL] RE: Technical assistance: Louisiana statewide freshwater ammonia criteria

Hey Mike,

Apologies for my delay in responding to your original message. We are shifting around workloads currently and some short-term deadlines came my way.

Regarding your initial response:

1. For the proposed action comment, I just meant to include what the proposed action would be once WQS have been submitted. The BE currently mentions that that proposed federal action is adoption of the new freshwater ammonia aquatic life water quality criteria. That part won't change of course, but by specific details I was thinking to include values for acute and chronic ammonia criteria that were used in the species effects analysis. From the BE, *"The acute ammonia CMC at pH 7 and 20°C (17 mg/L) is 6.18 times lower than the pallid sturgeon acute minimum effect threshold of 105.1 mg/L, suggesting pallid sturgeon is tolerant to acute ammonia concentrations consistent with the CMC under continuous exposure conditions."* The 17 mg/L for acute and 1.9 mg/L chronic values, normalized to pH 7 and 20°C, are used throughout the BE in comparison to species effect thresholds in order to determine potential impacts as a result of the proposed action. My thought process was to mention these two values in the proposed action description, specifying that they are normalized to pH 7 and 20°C, since they are used to justify the BE species effect determinations (NLAA in this case) and that the sliding scale will be used to adjust ammonia values in response to variation in environmental conditions.

- Let me know if this makes sense and if it does, whether you feel it is necessary to mention the ammonia criteria values and sliding scale within the proposed action section.

2. For the other comment, I was referring to 17 mg/L for acute and 1.9 mg/L chronic values, normalized to pH 7 and 20°C, as the "normalized values" that were referenced from the 2013 EPA "aquatic life ambient water quality criteria for ammonia" paper. So just if those acute and chronic values were to change, the new values would need to be listed within the final BE since they were used as justification for species effect determinations within the BE.

Let me know if I'm misunderstanding your responses and also what your thoughts are on the comments above.

Thanks,

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From: Schaub, Mike <Schaub.Mike@epa.gov>
Sent: Monday, July 20, 2020 10:01 AM
To: Hodges, Joe A <joe_hodges@fws.gov>
Subject: [EXTERNAL] RE: Technical assistance: Louisiana statewide freshwater ammonia criteria

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Hi Joe,

Thought I'd follow up from my previous email to see if you had any additional questions or comments? Just as an aside, I'll be around today and tomorrow, but taking off on vacation starting Wednesday of this week and running through all of next week. Will be back at it on Monday, August 3.

Mike Schaub
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From: Hodges, Joe A <joe_hodges@fws.gov>
Sent: Friday, July 10, 2020 2:52 PM
To: Schaub, Mike <Schaub.Mike@epa.gov>
Subject: Technical assistance: Louisiana statewide freshwater ammonia criteria

Hey Mike,

Here are some comments regarding the draft ammonia BE:

- The sliding scale tables would be good to include within the BE as reference material in order for us to evaluate specific areas for individual species if necessary.
- The proposed action should have specific details for ammonia criteria values (specifically the normalized acute and chronic values used throughout the BE to assess affects for species).
- If acute or chronic ammonia criteria at the normalized values will differ from the 2013

values referenced in the draft BE, this should be noted within the final BE in order to re-assess potential impacts for species and critical habitats.

Thanks,

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